

REMARKS

STATUS OF THE CLAIMS:

Claims 2-4, 7-9, 12-14, 17-19 and 21-32 are pending.

Claims 2-4, 7-9, 12-14, 17-19 and 21-32 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Elko et al., U.S. Patent No. 5,537,574, hereinafter referred to as "Elko," in view of Frey et al., U.S. Patent No. 5,390,328, hereinafter referred to as "Frey."

In accordance with the foregoing, claim 25 is amended and claims 2-4, 7-9, 12-14, 17-19 and 21-32 remain pending for reconsideration, which is respectfully requested.

No new matter has been added.

The Examiner's rejection is respectfully traversed.

35 U.S.C. § 103(a) REJECTION:

Independent claims 25 and 29-32 are allegedly unpatentable over Elko in view of Frey.

The Office Action acknowledges that Elko fails to disclose the claimed "storage control means for recording in the blocks in the external storage device the file, after recording the management information and sequence information indicating a sequence in which the file is to be recorded in the blocks in the external storage device, where the external storage device is external to the storage control means." The Office Action asserts that Frey at Fig. 1, step 110 and column 4, lines 47-53 discloses the same. Applicants respectfully disagree with the Examiner's assertion because Frey at column 4, lines 47-53, states:

In FIG. 1, a configuration is described which enables a complex of CPCs 101-104 to issue requests to, and receive responses from, a coupling facility. **structured external storage (SES)** facility 110. Programming can request operations to be performed by the SES which are designed to operate upon data resident in the SES and return status information.

In other words, Frey merely discusses an external storage. Frey, in the abstract, lines 5-10 further discusses:

One of the applications registers interest in particular state transitions affecting one or more lists within the list structure, causing a process within the SES to notify the appropriate processor when a list operation causes the particular state transition, without interrupting processing on the processor.

In other words, Frey merely discloses that when a state change in shared data in an external storage is detected, the external storage notifies a processor which shares the shared data.

The Examiner's assertion seems merely directed to one of the above-mentioned distinguishing features, i.e., where the claimed "management information and sequence information" are stored, but does not seem directed to another distinguishing features, i.e., when the claimed "management information and sequence information" are stored. In other words, Frey merely discusses an external storage, but fails to disclose or suggest the claimed "storage control means for recording in the blocks in the external storage device the file, **after recording the management information and sequence information indicating a sequence in which the file is to be recorded in the blocks in the external storage device**, where the external storage device is external to the storage control means," as recited, for example, in claim 29.

Applicants respectfully submit that Elko, Frey and any combination thereof fails to disclose or suggest the claimed "recording in the blocks in the external storage device the file, **after recording the management information and sequence information indicating a sequence in which the file is to be recorded in the blocks in the external storage device**," as recited in claim 20, that is, Elko, Frey and any combination thereof fails to disclose or suggest when the claimed "management information and the sequence information" are stored. The Office Action fails to cite any prior art against the claimed "recording in the blocks in the external storage device the file, **after recording the management information and sequence information indicating a sequence in which the file is to be recorded in the blocks in the external storage device**," as recited, for example, in claim 29. Accordingly, Applicants respectfully submit that claim 29 patentably distinguishes over the cited prior art.

Independent claim 25 relates to a computer-readable medium in a host computer encoded with instructions to control accessing data in a storage divided into blocks, which includes:

recording, in the blocks in an external storage device, the file, and the management information and sequence information indicating a sequence in which the file was recorded in the blocks after recording the file in the external storage device, where the external storage device is external to said host computer.

Accordingly, Applicants respectfully submit that claim 25 patentably distinguishes over the cited prior art.

Independent claim 30 relates to a computer implemented data access method, which includes:

recording in the blocks in the external storage device with the file, the management information and sequence information indicating a sequence in which the file was recorded in the blocks in the external storage device after recording the file in the external storage device, where the external storage device is external to said computer

Accordingly, Applicants respectfully submit that claim 30 patentably distinguishes over the cited prior art.

Independent claim 31 relates to a computer file device for accessing data in an external storage device, which includes:

a storage controller recording in the blocks in the external storage device with the file, the management information and sequence information indicating a sequence in which the file was recorded in the blocks after recording the file in the external storage device, where the external storage device is external to the storage controller

Accordingly, Applicants respectfully submit that claim 31 patentably distinguishes over the cited prior art.

Independent claim 32 relates to a computerized file access method, which includes:

recording in the blocks with the file, the management information and sequence information indicating a sequence in which the file was recorded in the blocks after recording the file in the external storage device, where the external storage device is external to said computer

Accordingly, Applicants respectfully submit that claim 32 patentably distinguishes over the cited prior art.

Dependent claims recite patentably distinguishing features of their own or are at least patentably distinguishing due to their dependence from the independent claims. Withdrawal of the rejection of pending claims, and allowance of pending claims is respectfully requested.

### **CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

Serial No. 10/033,905

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: 

Matthew H. Polson  
Registration No. 58,841

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501